



VIA E-MAIL – regcomments@ncua.gov

DATE

Ms. Mary F. Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

RE: CUNA's Comments on Advanced Notice of
Proposed Rulemaking for Part 704, Corporate
Credit Unions

Dear Ms. Rupp:

On behalf of the Montana Credit Union Network, I am filing this letter with the National Credit Union Administration to address the future of the corporate credit union system, in response to NCUA's Advance Notice of Proposed Rulemaking (ANPR) on the corporate credit unions. The Montana Credit Union Network, with 100% affiliation, represents 60 federally-insured natural person credit unions. Treasure State Corporate Credit Union is an associate member of our trade association.

Montana's credit unions look to their corporate credit union to provide settlement and payment processing services to assist with their member transactions, and investment services to meet their liquidity needs. The services that our corporate provides to our members is invaluable – from our smallest credit union, with assets less than \$500,000, to our largest credit union, with assets greater than \$1 billion, Montana's credit unions rely upon their corporate to provide products at a reasonable price.

Treasure State Corporate Credit Union has done an excellent job finding business partners to provide ancillary services such as Asset Liability Management, Member Business Lending, and brokerage services. These products are provided to our credit unions by a trusted partner – *their* corporate credit union. As a smaller corporate, TSCCU has the ability to really understand their member/owners and

Montana
Credit Union
League

League
Service Group

Montana
Credit Union
Advocacy Council

Montana
Credit Unions
for Community
Development

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(or) [www.montana
creditunions.coop](http://www.montana
creditunions.coop)
(and) www.you.coop

tailor services to meet the individual needs of those member/owners. It is imperative to us to ensure that services to our member credit unions will not be interrupted.

Please do not hesitate to contact me directly at 1-800-745-5546, ext. 135.

Sincerely,

A handwritten signature in black ink, appearing to read "Tracie Kenyon", with a long, sweeping horizontal line extending to the right.

Tracie Kenyon
President/CEO